

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ERNIE HINES D/B/A COLORFUL MUSIC,

Plaintiff,

v.

ROC-A-FELLA RECORDS INC, DEF JAM
RECORDINGS INC., UNIVERSAL MUSIC
GROUP, SONY MUSIC HOLDINGS INC.,
SHAWN CARTER p/k/a JAY-Z and
TIMOTHY MOSLEY p/k/a TIMBALAND,

Defendants.

CASE NO. 19-CV-04587-JPO

DECLARATION OF MARC DE NEREE

I, Marc de Neree, hereby declare as follows:

1. I am employed by Roc Nation, LLC ("Roc Nation"), which is not a party to this lawsuit, where I serve as executive assistant to Desiree Perez, Chief Operating Officer of Roc Nation. I respectfully submit this declaration in support of the motion to dismiss filed by Defendant Shawn Carter p/k/a Jay-Z ("Carter"). Unless otherwise stated, I have personal knowledge of the following facts and if called and sworn as a witness I could and would competently testify thereto.

2. I recently started working at Roc Nation. My first day of work was August 27, 2019; the same day that the process server attested to serving process on Carter (ECF No. 36).

3. In my capacity as executive assistant to Desiree Perez, I engage in a variety of administrative tasks, including but not limited to calendaring and setting up meetings and coordinating artist hospitality.

4. I am not, and have never been, expressly or impliedly authorized to accept service of process on behalf of Carter. I am not employed in any capacity by Carter, and do not serve as an executive assistant to him. Nor have I ever communicated with Carter, either directly or indirectly. It would be wholly outside the scope of my duties to accept anything on behalf of Carter in his individual capacity, let alone service of process in a pending litigation.

5. On August 27, 2019 (my first day being employed at Roc Nation), I received a package from a man in the lobby of Roc Nation's headquarters.

6. I believed the man was a courier asking me to sign for a routine mailing to the Roc Nation offices. My interaction with him was brief. I was not asked to accept service of process of a summons and complaint on Carter's behalf, and I certainly would not have said I was authorized to do so, as claimed in the affidavit of service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6th day of September, 2019 at New York, New York.



MARC DE NEREE